

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

RAYMOND ALBERT RODRIGUEZ,	§	
	§	
<i>Plaintiff,</i>	§	
v.	§	
	§	Civil Action 4:14-cv-00968
ELI LILLY AND COMPANY;	§	
LILLY USA, LLC; and	§	
JULIA DAWN RAMOS,	§	
	§	
<i>Defendants.</i>	§	

MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Defendants hereby respectfully move for summary judgment on all claims of Plaintiff Raymond Albert Rodriguez on the grounds that there are no genuine issues as to any material facts and that Defendants are entitled to a judgment as a matter of law. This motion is supported by the following evidentiary materials:

Exhibit A:	Relevant Excerpts from Deposition of Raymond A. Rodriguez and Relevant Exhibits
Exhibit B:	Relevant Excerpts from Deposition of Thomas Bills
Exhibit C:	Declaration of Julia Dawn Ramos and Exhibits Attached Thereto
Exhibit D:	Declaration of Melissa A. Popa and Exhibits Attached Thereto
Exhibit E:	Relevant Excerpts from Deposition of Julia Ramos

The grounds for this Motion are more fully stated in the accompanying Memorandum in Support of Defendants' Motion for Summary Judgment.

Respectfully submitted,

By: s/Ellen E. Boshkoff
(By Permission of Attorney-In-Charge)

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of April, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of filing to the counsel of record in this matter.

By: s/Ellen E. Boshkoff